

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

EMAD EZZAT

)
)
)
)
) Criminal No. 04 mj 00846 MBB
)
)
)

**DEFENDANT'S TO MOTION TO FURTHER
MODIFY RELEASE CONDITIONS**

Defendant Emad Ezzat, by and through his attorney, hereby moves the Court to further modify the release conditions outlined in the "Order Setting Conditions of Release" dated June 7, 2004 to permit him to extend his current travel to Egypt from June 21, 2005 to July 21, 2005. In support of this motion the Defendant states as follows:

1. The United States has no objection to this motion.
2. The Court recently allowed a motion permitting the Defendant to travel to his native Egypt to visit with his ill father and to pick up his 8-year old daughter and return with her to the United States. Both the Defendant and his daughter are U.S. citizens.
3. The original return date on this motion was June 21, 2005. Due to continuing family and personal reasons, Defendant requests that his return date be extended to July 21, 2005.
4. Defendant also requests that he be permitted to travel from Egypt to Saudi Arabia for religious observances (Ummrah) between June 23 and July 2, 2005.

5. Defendant will provide the Pretrial Services Agency, and the Assistant U.S. Attorney, with his flight information and contact information abroad.
6. Defendant has maintained contact with the undersigned during his current travels, and has complied fully with all of the release conditions established by the Court.

WHEREFORE, the Defendant respectfully requests that this motion be allowed.

By his attorney,

/s/ Paul V. Kelly
Paul V. Kelly
KELLY, LIBBY & HOOPES, P.C.
175 Federal Street
Boston, MA. 02110
(617) 338-9300